

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	: 20 Civ. 10832 (AT) (SN)
	:
- against -	: ECF Case
	:
RIPPLE LABS, INC., BRADLEY GARLINGHOUSE,	:
and CHRISTIAN A. LARSEN,	:
	:
Defendants.	: :
	:
-----x	

DECLARATION OF VANESSA A. COUNTRYMAN

I, Vanessa A. Countryman, pursuant to 28 U.S.C. § 1746, hereby declare that:

1. I am the Secretary of the United States Securities and Exchange Commission (“Commission”).
2. This declaration is being made based on my personal knowledge and I would be competent to testify to the facts set forth in this declaration if I were called as a witness at trial.
3. On February 23, 2022, the Commission, through its Deputy General Counsel for General Law and Management, to whom it has delegated the authority to assert the governmental privileges, and who gave personal consideration to the matter, determined on behalf of the Commission, to assert a claim of governmental deliberative process privilege over attorney notes made by Matthew Estabrook and reflecting a November 9, 2018 meeting between Commissioner Elad Roisman and Bradley Garlinghouse.
4. The deliberative process privilege is being asserted as to this document because it reflects Mr. Estabrook’s predecisional deliberations regarding what information may be important and relate to future Commission decisions. The production of these notes would likely

have an inhibiting effect upon the Commission and its staff members and thus would have a detrimental effect on the Commission's decision-making process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on February 23, 2022, in Washington, DC.



Vanessa A. Countryman